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Project Officer Name Meghan Hessenauer				Branch/Mail Code: Phone Number: 202-566-1040					
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Performance Work Statement Contract EP-C-12-021 Work Assignment 2-05

Title: Evaluating Categories of Industrial Dischargers for Potential National Regulations

Work Assignment Manager: William F. Swietlik

U.S. EPA/OW/OST/EAD (4303T)

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Alternate

Work Assignment Manager: Samantha Lewis

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Period of Performance: September 26, 2014 through September 25, 2015

Background:

The 1972 Clean Water Act directs EPA to develop national regulations placing limits on the pollutants that are discharged by categories of industry to rivers and streams (termed "effluent guidelines") or to sewage treatment plants¹ (termed "pretreatment standards"). The Act also directs EPA to develop national regulations for new industrial facilities (termed "new source performance standards").

An additional critical component of the Act is that it requires EPA to periodically study and review existing effluent guidelines, pretreatment standards, and standards of performance for new sources and consider the need to develop regulations for industries not covered by a national regulation. These planning requirements are found in several sections of the Clean Water Act (CWA). Section 304(m) provides for an effluent guideline plan that contains three basic elements to be published on February 4, 1987 and biennially thereafter.

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¹Also referred to as publicly owned treatment works or POTWs.

First, EPA must establish a schedule for the annual review of existing effluent guidelines promulgated under Section 304(b), (i.e., limitations for existing direct dischargers) and for annual revision of the guidelines if appropriate (see Section 304(m)(1)(A)). Second, EPA must identify categories of sources that directly discharge toxic or non-conventional pollutants for which EPA has not published effluent limitations guidelines or new source performance standards (see Section 304(m)(1)(B)). Third, EPA must set a schedule for the establishment of national regulations for any categories identified in the second step, with a final promulgated regulation three years after identification in a national plan (see Section 304(m)(1)(C)).

For indirect dischargers, Section 304(g) requires EPA to review at least annually and, if appropriate, revise the pretreatment standards EPA has promulgated under CWA Section 307. In addition, Section 307(b) provides that EPA must promulgate pretreatment standards for categories of sources not subject to existing pretreatment standards if there is pass-through or interference at POTWs. As good government practice, EPA publishes the findings of its annual reviews of direct and indirect dischargers together in one document, the "Effluent Guidelines Program Plan." EPA publishes a preliminary Plan in odd-numbered years and publishes a final Plan in even-numbered years after public review on the preliminary Plan.

Under this work assignment, ERG will provide technical support to EPA in conducting its Section 304/307 annual review of existing effluent guidelines and standards and identifying and evaluating new sources of wastewater discharges. In addition, ERG will provide support to EPA with the following tasks:

- Develop a work plan and provide bi-monthly and monthly progress reports;
- Develop an electronic schedule compatible with Microsoft Project;
- Develop a revised annotated timeline for completing the 2014 Annual Review and guiding the 2015 Annual Review and developing the 2014 Final Effluent Guidelines Program Plan and 2015 Plan;
- Prepare quarterly Quality Assurance reports;
- Provide technical support to EPA in evaluating industrial facilities or categories;
- Provide technical support to EPA for briefings and for public and industry outreach activities; and,
- Provide technical support to EPA for Section 304 activities, preparing and maintaining a record, and drafting support documents.

During this work assignment, ERG will provide the following deliverables to EPA:

- Work plan and cost estimate;
- Bi-monthly and monthly progress reports;
- Any necessary revisions to the existing QAPP, if required by EPA;
- Quarterly Quality Assurance reports;
- Detailed Investigations on Specific Industries Identified by EPA;
- Analysis supporting Section 304 effluent guidelines review activities;
- Docket materials; and,

Quick turnaround tasks.

General Work Assignment Requirements:

Deliverable Formatting and Terminology. Throughout this Work Assignment, ERG shall provide draft and final reports to EPA in electronic and hard copy formats. The EPA WAM and contractor will use the terminology in this work assignment to improve the deliverable review process. See Attachment A. ERG shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the EPA Work Assignment Management (WAM) prior to file preparation. The EPA WAM will identify for ERG which documents will be posted on EPA's Effluent Guidelines webpage (http://epa.gov/guide/304m/index.html). These documents posted to the Effluent Guidelines webpage will need to be Section 508 compliant.² For planning purposes, ERG should assume that the following documents will be posted to EPA's Effluent Guidelines webpage: (1) the Annual Review Report for the 2014 and 2015 reviews, the Final 2014 Effluent Guidelines Program Plan, the Preliminary 2015 Plan and (2) User's Guides for the dockets for the all Plans.

<u>Travel</u>. EPA anticipates a limited need for non-local travel by contractor employees and/or subcontractors to support the scope of this work assignment (e.g., site visits and sampling activities, attending public meetings, attending scientific/technical conferences). This may include up to five site visits for the metal finishing study. ERG will provide specific travel details and costs in a request for travel approval submitted for WAM review and Project Officer (PO) signature before each trip occurs (as specified by the contract per clause H.32).

Confidential Business Information. ERG will, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. ERG will manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in its "Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan," dated December 5, 2007 or its successor approved plans. See Task 9 for more details.

<u>Identification as Contracting Staff.</u> To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public ERG should refer all interpretations of policy to the EPA WAM.

<u>Limitation of Contractor Activities</u>. ERG will submit drafts of all deliverables to the EPA Work Assignment Manager (WAM) for review prior to submission of the final product. ERG will incorporate all EPA WAM comments into all final deliverables, unless otherwise agreed upon by the EPA WAM. ERG will adhere to all applicable EPA management control procedures as implemented by the EPA Contracting Officer (CO), PO, and WAM.

<u>Deliverables.</u> Major technical reports shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be

² See http://www.epa.gov/epahome/accessibility.htm.

prepared with proper adherence to EPA style and format requirements.

<u>Deadlines</u>. For the purpose of developing the work plan, ERG shall assume the deliverable due dates provided with each task. Most of the deadlines are associated with Agency milestones which are subject to change. Based upon past experience with the 304(m) planning process, any changes in schedule tend to result in extensions, rather than shorter schedules. In either case, if the schedule changes then the EPA WAM, PO, or relevant task manager will change the deliverable deadlines through written technical direction. The EPA WAM/PO/TM also will use written technical direction to change a deadline if management requires any particular deliverable earlier than specified in the following tasks. For any deliverable, no deadline will extend beyond the WA period of performance. The following table provides a summary of the Agency milestones.

Major Milestones		
Publication of the Final 2014 Plan		
Publication of the 2014 Annual		
Review Report (ARR)		
Conducting the 2015 Annual Review		
Publication of Preliminary 2015 Plan		
Publication of the 2015 ARR		

Conferences, Meetings and Other Events: No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the EPA Contracting Officer, PO and WAM of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance. Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the Contracting Officer.

Tasks:

Task 1 – Program Management:

ERG shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this work assignment. The work plan shall also include a list of the key personnel to participate in the work assignment. ERG shall also estimate direct costs such as travel, computer costs, typing, etc.

ERG shall provide electronic copies of the monthly progress reports to the EPA WAM and PO.

Each progress report shall describe the technical work and expenditures for the same time period as the corresponding invoice. The reports shall list by task the amount of work completed and include a table of hours by personnel for each task. The reports also shall identify any problems or difficulties.

In addition to the monthly progress reports, ERG shall prepare monthly and mid-monthly status summaries (in a Microsoft Excel compatible format) to the EPA WAM, EPA PO, and task managers. The monthly and mid-monthly status reports shall list the following information by task: budgeted LOE for each task, summaries of current and cumulative costs and LOE expended for the reporting period. The mid-monthly and monthly summaries of costs and expenditures LOE shall be provided prior to the progress report.

ERG will prepare an annotated timeline for completing the 2014 Final ARR, the 2014 Final Plan and for preparing the Prelim. 2015 Effluent Guidelines Program Plan and conducting the 2015 annual review. This annotated timeline will describe the major elements of developing these materials or conducting these investigations from beginning to end and their timing and LOE. The EPA WAM will use the timeline to identify all major project tasks, track the project's progress, and coordinate all aspects of the project. ERG will update and revise the annotated timeline as needed. The timeline will be used by EPA to help get the 304m planning process back on statutory schedule.

TASK 1 – DELIVERABLES			
Deliverable	Deadline		
Work Plan	• 15 days from issuance of work assignment		
Progress Reports	• Monthly		
Mid-Monthly Reports	Mid-monthly and monthly		
1st Draft - Draft Annotated Timeline	• 45 days from issuance of work assignment		
2 nd Draft - Draft Annotated Timeline	• 14 days from receipt of EPA WAM comments		
1st Draft - Electronic Schedule (compatible with MS Project)	• 45 days from issuance of work assignment		
2 nd Draft - Electronic Schedule (compatible with MS Project)	• 14 days from receipt of EPA WAM comments		

Task 2 – Quality Assurance:

Quality Assurance Project Plans are required under the Agency's Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1A2 and implementing guidance CIO-2105-P-01-0. All projects that involve the generation, collection, analysis and use of environmental data must have an approved QAPP to assure the quality, objectivity, integrity and utility of the data and information used in the project.

QA Project Plan Requirements

EPA policy requires that an approved Quality Assurance Project Plan (QAPP) or Programmatic Quality Assurance Project Plan (PQAPP) be in place for work that involves the collection, generation, evaluation, analysis or use of primary environmental data. The QAPP or PQAPP defines and documents how specific data generation and collection activities shall be planned, implemented, and assessed during a particular project. This contract has an approved PQAPP for all necessary work envisioned under this work assignment.

ERG shall adhere to the approved PQAPP when generating, collecting and determining the use of data and information for any applicable task under this work assignment. Specifically, Sections 3 and 4 of the ERG PQAPP apply to the collection and analysis of secondary (existing) data under this work assignment. Sections 7-10 and section 12 are also applicable to this work assignment. No primary data collection or analysis is envisioned under this work assignment. If any work required under this work assignment is not covered under the PQAPP, then ERG shall prepare a Supplemental QAPP (SQAPP) for those tasks.

Deliverables and schedule under Task 2

TASK 2 – DELIVERABLES			
Deliverable	Deadline		
SQAPP	• 10 days after notification by the WAM and or QAC that an SQAPP is needed.		
Revisions based on EPA feedback	• 7 days after receipt of EPA feedback.		
Final SQAPP for this Work Assignment	• 5 days after EPA feedback		
PQAPP/SQAPP progress reports	• Monthly		

Task 3 – Completion of 2014 Annual Review Report (ARR):

ERG shall support EPA in completing the 2014 304m Annual Review Report (ARR). ERG shall complete the preparation of all necessary supporting documentation, data and information for the 2014 ARR. ERG shall provide support in writing, formatting, proofing, editing and reviewing the draft report to create a final report. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts.

ERG shall also finish assembling all information for the public and confidential records for the 2014 review. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any Federal Docket Management System (FDMS) requirements.

TASK 3- DELIVERABLES				
Deliverable	Date			
Complete the 2014 Annual Review Report (ARR)	• According to a schedule developed by ERG and approved by the WAM.			
Provide the WAM with a final draft of the 2014 ARR	• According to a schedule developed by ERG and approved by the WAM.			
Respond to comments and necessary revisions to the document	• Within 10 working days after being provided by the WAM.			
Provide the Final 2014 Annual Review Report	• According to a schedule developed by ERG and approved by the WAM.			

Task 4 -- Preparation and Publication of the 2014 Final Plan:

ERG shall support EPA in writing and completing the Final 2014 ELG Plan. ERG shall complete the preparation of all necessary supporting documentation, data and information for the Final 2014 Plan. ERG shall provide support in writing, formatting, proofing, editing and reviewing and revising the draft Final Plan. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts about the Plan. ERG shall provide all necessary support to compile address and respond to all public comments from the Final 2012/Preliminary 2014 Plan.

ERG shall also finish assembling all information for the public and confidential records for the Final 2014 Plan. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FDMS requirements.

TASK 4- DELIVERABLES				
Deliverable	Date			
Draft the Final 2014 ELG Plan	• According to a schedule developed by ERG and approved by the WAM.			
Provide the WAM with a draft of the Final 2014 Plan	• According to a schedule developed by ERG and approved by the WAM.			
Compile, address and respond to all public comments from the Preliminary 2014 Plan	• According to a schedule developed by ERG and approved by the WAM.			
Respond to WAM/reviewer comments and necessary revisions to the document	• Within 10 working days after being provided by the WAM.			
Provide the Final 2014 ELG Plan	• According to a schedule developed by ERG and approved by the WAM.			

<u>Task 5 – Conduct of the 2015 Annual Review and Preparation of the 2015 Annual Review Report (ARR):</u>

ERG shall support EPA in completing the 2015 304m annual review and in preparation of the 2015 Annual Review Report (ARR). The 2015 annual review is to be completed using the Toxicity Ranking Analysis (TRA) based on DMR and TRI data and other information and

databases. ERG shall complete the preparation of all necessary supporting documentation, data and information for the 2015 annual review and the ARR. ERG shall provide support in writing, formatting, proofing, editing and reviewing the draft report to create a final report. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts.

ERG shall also finish assembling all information for the public and confidential records for the 2015 review. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FDMS requirements.

TASK 5- DELIVERABLES				
Deliverable	Date			
Complete the 2015 Annual Review Report (ARR)	• According to a schedule developed by ERG and approved by the WAM.			
Provide the WAM with a final draft of the 2015 ARR	• According to a schedule developed by ERG and approved by the WAM.			
Respond to comments and necessary revisions to the document	• Within 10 working days after being provided by the WAM.			
Provide the Final 2015 Annual Review Report	• According to a schedule developed by ERG and approved by the WAM.			

Task 6 - Preparation and Publication of Preliminary 2016 Plan:

ERG shall support EPA in preparing the Preliminary 2016 ELG Plan. ERG shall complete the preparation of all necessary supporting documentation, data and information for the Prelim. 2016 Plan. ERG shall provide support in writing, formatting, proofing, editing and reviewing and revising the draft Prelim. Plan. ERG shall provide support for the publication, web posting and possible sharing of information in public meetings and other outreach efforts about the Plan.

ERG shall also finish assembling all information for the public and confidential records for the Prelim. 2016 Plan. ERG shall coordinate with the Office of Water Docket office to ensure the record will meet the docket's requirements including any FMDS requirements.

TASK 6- DELIVERABLES				
Deliverable	Date			
Draft the Prelim. 2016 ELG Plan	• According to a schedule developed by ERG and approved by the WAM.			
Provide the WAM with a draft of the Prelim. 2016 Plan	• According to a schedule developed by ERG and approved by the WAM.			
Respond to WAM/reviewer comments and necessary revisions to the Prelim. 2016 Plan	• Within 10 working days after being provided by the WAM.			
Provide the final draft of the Prelim. 2016 ELG Plan ready for publication	• According to a schedule developed by ERG and approved by the WAM.			

Task 7 – Conduct and Prepare Other Preliminary Studies and Investigations as Needed.

ERG shall provide support for the implementation of existing and potentially revised effluent guidelines rulemakings, including preliminary category reviews, Preliminary Studies and other investigations of industry discharges as needed and identified by EPA and from the annual reviews. Specifically, ERG will help with the preparation of a Preliminary Study of the Metal finishing industry. The Metal Finishing study will entail conducting up to five site visits to metal finishing plants. For planning purposes ERG should assume three (3) investigations and other studies will be necessary during the performance period.

TASK 7- DELIVERABLES			
Deliverable	Date		
Draft of Prelim. Study report for Metal Finishing	• According to a schedule developed by ERG and approved by the WAM.		
Drafts of other studies and investigations as needed.	According to a schedule developed by ERG and approved by the WAM.		
Final study report for Metal Finishing	• According to a schedule developed by ERG and approved by the WAM.		
Final reports/memos for other studies and investigations	• According to a schedule developed by ERG and approved by the WAM.		

<u>Task 8 – Industrial Wastewater Treatment Technology (IWTT) and Historic ELG Access (HELGA) Databases</u>

ERG shall provide technical support for the development and ongoing implementation of databases for the support of 304m planning and ELG implementation, including the IWTT Database and the HELGA Database. Specifically, ERG will help with the preparation of the databases where necessary, coordinate with other contractors, share data and information for populating the databases and support the ongoing collection of data and information to go into the databases as directed by the WAM and Task Manager.

TASK 8- DELIVERABLES			
Deliverable	Date		
Ongoing population of IWTT	Ongoing, with Technical Direction from WAM and TM		
Completion of IWTT database reports and formats	According to a schedule developed by ERG and approved by the WAM and TM.		
Preparing the IWTT Database for public access	According to a schedule developed by ERG and approved by the WAM and TM.		
Developing the HELGA Database	According to a schedule developed by ERG and approved by the WAM and TM		

Task 9 – General Effluent Guidelines Implementation Support and Technical Support:

ERG shall provide technical support for the implementation of existing effluent guidelines

rulemakings. Specifically, ERG will help with the preparation of guidance documents supporting the implementation of the existing effluent guidelines. For planning purposes ERG should assume eight (8) technical memos supporting existing effluent guidelines. Preparation of these eight (8) technical memos will likely involve the review of current permits and fact sheets, DMR data, and other facility specific information.

ERG will provide technical support to the EPA in responding to inquiries from other EPA offices, stakeholders, and permitting authorities in implementing existing effluent guidelines. For planning purposes ERG should assume twelve (12) requests of varying effort will be required by EPA during the period of performance.

ERG will prepare materials identified by the EPA WAM through written technical direction to support Agency briefings as well as EPA's 304(m) outreach activities to the public and to industry. These materials may include presentations, reports, brochures, leaflets, and posters.

ERG shall provide supporting information for briefings and support on FOIAs (i.e. locating and supplying the WAM or PO with relevant information to be used in the Agency's response to the FOIA) as directed in writing by the WAM or PO. For purposes of the workplan, ERG shall assume that it will support three FOIA requests and three briefings.

ERG may be required to attend outreach activities or ship materials on a case-by-case basis as required by the EPA WAM's technical direction. ERG will submit detailed plans and approaches upon receipt of technical direction from the EPA WAM. ERG will submit materials to EPA for review and approval prior to their implementation. When conducting outreach activities, ERG personnel will clearly identify themselves as contractor employees both orally and via the use of identification badges. Typically ERG will be required to provide products within two weeks or less.

TASK 9 – DELIVERABLES			
Deliverables	Deadline		
Eight Technical Memos Supporting Existing Effluent Guidelines	By written technical direction.		
Twelve (12) Technical Support Actions For EPA Offices, Stakeholders, And Permitting Authorities In Implementing Existing Effluent Guidelines	By written technical direction.		
Presentations, Reports, Brochures, Leaflets, And Posters	By written technical direction.		
Briefing / FOIA Support	• Requests to be supplied within 14 days		

Task 10- CBI Procedures:

During the course of the work assignment, ERG will be accessing and evaluating CBI. As such, ERG shall adhere to EPA's CBI policy and procedures as described in the contract statement of work, Section 1.2. ERG must maintain CBI security clearance to use CBI information (Refer to Section H of the schedule for security requirements and 70 FR 9070; February 24, 2005). ERG will not disclose any CBI to anyone other than EPA without prior written approval from the EPA WAM. ERG shall utilize CBI information in accordance with contract requirements and limitations to include using the "Office of Science & Technology Confidential Business Information (OST-CBI) Application Security Plan," dated August 1, 2011 or its successor approved plans.

TASK 10 - DELIVERABLES			
Deliverable	Deadline		
A CBI program in compliance with the requirements of the contract and the requirements of ERG's CBI Plan.	Ongoing		

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PERFORMANCE WORK STATEMENT CONTRACT EP-C-12-021 WORK ASSIGNMENT 2-05 AMENDMENT 1

Title: Evaluating Categories of Industrial Dischargers for Potential National Regulations

Work Assignment Manager (WAM): William F. Swietlik

U.S. EPA/OW/OST/EAD (4303T)

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Alternate

Work Assignment Manager (AWAM): Samantha Lewis

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Period of Performance: May 28, 2015 through September 25, 2015

Introduction:

This is an amendment to the original work assignment. The purpose of this amendment is to add additional LOE to allow completion of ongoing existing tasks and to add two new tasks. No other terms or conditions of the original work assignment are changed or modified. The two new tasks are comparable (in scope, purpose and data and information employed) to the tasks in the original work assignment and all CBI, PQAPP and other applicable requirements in the original work assignment remain in effect.

ERG shall develop an amended work plan describing the necessary steps and estimated LOE to complete each of the new tasks included in this amendment. Current work ongoing under existing Tasks 7, 8 and 9 need additional LOE to allow completion, as directed by the WAM.

New Tasks:

New Task 11. – EJScreen:

ERG will review the existing EJScreen model and become intimately familiar with how it is constructed and how it operates. ERG shall review and understand the development and assumptions of the current water indicator and other environmental indicators. ERG shall develop an enhanced Water Indicator using the DMR Loading Tool data to provide enhanced quantification of discharging facilities, their location, pollutants and aggregate loadings that will be identified in EJScreen. ERG shall develop an algorithm for consolidating the pollutant loadings for all major point sources with the census blocks, or other unit - as defined by the EJScreen model. From the consolidated pollutant loadings by census block ERG shall develop a census block-weighted or loadings-scaled national indicator. If possible, the enhanced Water Indicator shall include a downstream or down-river composite loading factor. ERG will provide support to assist EPA in implementing this new Water Indicator into EJScreen.

TASK 11 – DELIVERABLES					
Deliverable	Deadline				
Amended Work Plan	In accordance with contract requirements				
Draft technical description of enhanced Water Indicator	June 1, 2015 or as directed from WAM				
Revised enhanced Water Indicator	August 1, 2015				
Final Water Indicator	September 1, 2015				
Description of mechanism for incorporating and updating DMR Loading Tool data into EJScreen	September 25, 2015				
Written description of enhanced water indicator for EJScreen documentation	September 25, 2015				
Technical support to EPA at workgroup meetings	Ongoing				

New Task 12. – Records Management:

As EAD's prime technical contractor for many years, the Contractor has stored and managed confidential (CBI) and non-confidential (non-CBI) records for numerous rulemakings and other EAD activities. After conducting reviews in 2012 and 2014, the Contractor reported possessing records for, among others, the following (docket numbers included, if appropriate):

Concentrated Animal Feeding Operations (CAFOs): EPA-HQ-OW-2002-0025 and EPA-HQ-OW-2005-0037

Coal Mining (Western Remining): W-99-13

Coastal Oil and Gas

Pharmaceutical Manufacturing: OW-2003-007, plus a 09/1998 rule for which there was no docket number

POTW Study

Synthetic-based Drilling Fluids

Airport Deicing: EPA-HQ-2004-0038

Iron and Steel: W-00-25 II and EPA-OW-2002-0027

Pulp and Paper: no docket numbers for 04/1998 rule or 08/1998 amendment

Alaska Cruise Ships

Metal Products and Machinery Project File

Since the dockets above are now inactive, it is appropriate to properly archive those records which should be preserved and to destroy those records for which EAD no longer has any need of retention. As a general matter, EAD tasks the Contractor with disposal of any non-CBI found in the records listed above. The only non-CBI records that may be retained, at EAD's direction, are those which may be used to assemble future historic ELG databases. Such records are most likely found in the CAFOs, Coastal Oil and Gas, POTW Study, Airport Deicing, Iron and Steel, and Pulp and Paper records.

Any CBI in the records above will be handled one of two ways: either destruction or preparation for transfer to the Federal Records Center (FRC). Any CBI non-docket items shall be destroyed, with their CBI cover sheets retained and delivered to EAD if the CBI passed through EAD. CBI docket items, on the other hand, will be prepared for delivery to the FRC, on a docket-by-docket basis. The Contractor will prepare indices in MS Word and Adobe Acrobat formats for each box of such CBI records. Once completed, the Contractor will arrange for delivery of the boxes to EAD.

EAD is also aware that the Contractor already possesses records for the Pharmaceutical Manufacturing Industry which have previously acceded to the FRC. Since it has also identified those records as currently inactive, the Contractor shall return those boxes to EAD so that they can be returned to the FRC.

TASK 12 – DELIVERABLES					
Deliverable	Deadline				
Amended Work Plan	In accordance with contract requirements				
Return of Pharmaceutical Manufacturing FRC boxes to EAD	July 1, 2015				
Disposal of non-CBI	September 25, 2015				
Destruction of CBI non-records	September 25, 2015				
Delivery of CBI records to EAD, properly boxed and indexed: September	September 25, 2015				

United States Environmental Protection Agency Washington, DC 20460				Work Assignme	ent Nu	mber				
EPA		Work Assignment					her	X Amendm	nent Number:	
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Contract Number	Contract Perio	nd na/a	26/2012 To	09/25/2	2015	Title of Mork A	soiann			
ED_C_12_021						Title of Work Assignment/SF Site Name Eval of Industrial Dischargers				
Contractor	Base		Option Period Nur	mber 2 y Section and pa	ragraph of Cor		mau	Strial Dis	schargers	
EASTERN RESEARCH GROUP, INC. See PWS										
Purpose: Work Assignment		П	Work Assignment C	Close-Out		Period of Perfe	ormanc	e		
X Work Assignment	Amendment	\Box	Incremental Fundin	g						
X Work Plan Approv	val			-		From 05/	28/2	2015 To 09	/25/2015	
Comments:	· ··									
This Work Plan Approval inc	orporates Amendr	nent 1.								
Superfund		Accou	inting and Appro	priations Data	a			X	Non-Superfund	
SFO	Note: To report a	Iditional acco	ounting and appropri	ations date use	EPA Form 190	0-69A.				
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Total:	\$56/,	572.00				6,133				
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Contractor WP Dated: 06/24/20	1.5		16,597.00			LOE: 1,383				
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Work Assignment Manager Name Will	liam Swietlik				<u> </u>	Branch/Mail Code:				
					205 02050	Phone Number 202-566-1129				
(Signature) (Date)			10.00	FAX Number:						
Project Officer Name Meghan Hessenauer					nch/Mail Code:	O 760 101	5 8 × 8 6 52 9			
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	United States Envi	ronmental Protection	Agency		Work Assignment N	umber		
EPA		ashington, DC 20460	2-29					
EFA	Worl	rk Assignment			Other	Amenda	nent Number:	
Contract Number	2015	Title of Work Assign	ment/SF Site Nar	ne				
EP-C-12-021	Base	Option Period Nu			Steam Guide	lines Reg	Support	
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EASTERN RESEARCH GROUP Purpose: X Work Assignment	, INC.		PWS		Period of Performan			
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Work Assignment		Incremental Fundin	ıg		From 09/26/	2014 To 09	1/25/2015	
Work Plan Approve					7.6 03/20/	2014 10 03	., 23, 2013	
Work shall not commence on	this work assignme	nt until September	r 26, 2014.					
Superfund		Accounting and Appro	priations Data	Ĭ		X	Non-Superfund	
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(Max 2)								
υ DCN Budget/FY App	oropriation Budget Org/C	Code Program Element	Object Class	Amount (Do	ollars) (Cents)	Site/Project	Cost Org/Code	
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Authorized Work Assignment Ceiling								
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Other Agency Official Name		(Date)		Number:			
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(Signature)		(Date)		Number:			
Contracting Official Name Brad Hea	ath	t= 			nch/Mail Code:			
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Performance Work Statement Contract EP-C-12-021 Work Assignment 2-29

Title: Steam Electric Effluent Guidelines Regulatory Support

Work Assignment Manager (WAM): Jezebele Alicea-Virella

Alternate Work Assignment Manager: Ronald Jordan

Task Manager (Task 4): William Swietlik

Period of Performance (POP): September 26, 2014 through September 25, 2015

I- Purpose:

The purpose of this work assignment is to guide the contractor identifying tasks that need to be performed to provide regulatory support to EPA in the development of effluent limitations guidelines and standards for the steam electric power generating point source category (40 CFR Part 423).

II- Introduction:

The Clean Water Act directs EPA to develop national regulations placing limits on the pollutants that are discharged by categories of industry to rivers and streams or to sewage treatment plants. This work assignment supports EPA's development of effluent limitations guidelines and standards (collectively referred to as ELGs) for the steam electric power generating point source category (40 CFR Part 423).

Key tasks under this work assignment include:

- Technical support in planning and scoping rulemaking activities for the final rule;
- Update analyses performed for proposed rule to address public comments received during comment period:
 - analyzing new data that is submitted, as well as reassessing data collected by the industry questionnaire and other sources;
 - characterization of steam electric power plant facilities, operations, and wastewater discharges;
 - assisting EPA's development of numeric effluent limitations;
 - evaluating the treatability of high concentrations of dissolved mercury;
 - estimating the cost for installing pollution control technology or implementing process changes, quantifying associated pollutant reductions, and evaluating environmental improvements associated with regulatory control options.

- Preparing technical support documents and memoranda describing the technical analyses, including the methodologies used and results, conducted to support EPA's regulatory options for final revisions to effluent guidelines;
- Compiling and organizing the rulemaking record for final regulations, including associated docket preparations.
- Compiling and organizing public comments received during public comment period of proposed rule, and assisting with the review of comments and the development of written technical responses to the comments.
- Evaluating technical data submitted in comments and revise technical methodology and analyses, as appropriate.
- Providing technical support for site visits and other activities, including public meetings and outreach.

II- General Work Assignment Requirements (PWS Section 3.0)

Deliverable Formatting and Terminology

Throughout this work assignment, the contractor shall provide draft and final reports to EPA in electronic format, with hard copy format also provided when directed by the work assignment manager. The EPA WAM and contractor will use the terminology defined in Attachment A to improve the deliverable review process. The contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the EPA WAM prior to file preparation. The EPA WAM will identify for the contractor which documents will be posted on EPA's Effluent Guidelines webpage (http://water.epa.gov/scitech/wastetech/guide/steam_index.cfm). These documents posted to the Effluent Guidelines webpage must be Section 508 compliant.¹

Travel

Non-local travel by the contractor employees and/or subcontractors will be required to support the scope of this work assignment (e.g., site visits and public meetings). The contractor shall provide specific travel details and costs in a request for travel approval by the EPA WAM and the EPA Project Officer (PO) before each trip occurs (as specified by the contract per clause H.32).

Event Expenses Not to Exceed \$20,000

No single event under this Work Assignment is anticipated to exceed \$20,000. The Contractor shall immediately notify the EPA Contracting Officer, PO and WAM of any anticipated event involving support for a meeting, conference, workshop, symposium, retreat, seminar or training that may potentially incur \$20,000 or more in cost during performance.

Conference expenses are all direct and indirect costs paid by the government and include any associated authorized travel and per diem expenses, room charges for official business, audiovisual use, light refreshments, registration fees, ground transportation and other expenses as defined by the Federal Travel Regulations. All outlays for conference preparation should be included, but the federal employee time for conference preparation should not be included. After notifying EPA of the potential to reach this threshold, the Contractor shall not proceed with the task(s) until authorized to do so by the

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¹ See http://www.epa.gov/epahome/accessibility.htm.

Contracting Officer.

Confidential Business Information

During the course of the work assignment, the contractor will be accessing and evaluating CBI. The contractor shall, at all times, adhere to Confidential Business Information (CBI) procedures when handling industry information. The contractor shall manage all reports, documents, and other materials and all draft documents developed under this work assignment in accordance with the procedures set forth in the "Security Plan for Handling Confidential Business Information Under the Clean Water Act" (September 2002) or its successor approved plans.

Identification as Contracting Staff

To avoid the perception that contractor personnel are EPA employees, contractor personnel shall be clearly identified as independent contractors of EPA when participating in events with outside parties and visiting field sites. When speaking with the public the contractor should refer all interpretations of policy to the EPA WAM.

Limitation of Contractor Activities

The contractor shall submit drafts of all deliverables to the EPA WAM for review prior to submission of the final product. The contractor shall incorporate all EPA WAM comments into all final deliverables, unless otherwise agreed upon by the EPA WAM. The contractor will adhere to all applicable EPA management control procedures as implemented by the EPA Contracting Officer (CO), PO, and WAM.

Deliverable Due Dates

For the purpose of developing this work plan, the contractor shall assume the deliverable due dates in the tables for each task presented further. Major technical deliverables shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements.

III- Tasks

Task 1 – Program Management (PWS Section 3.0)

The contractor shall develop a detailed work plan that outlines the approach and methodology necessary for each task identified in this work assignment. The workplan shall specify the necessary steps for each task; list of the personnel projected to participate; direct and indirect costs such as labor, travel, and sampling supplies; and estimated hours and budget by task and deliverables to complete this work assignment. The workplan shall be submitted to the EPA PO and EPA WAM by 15 days after WA receipt.

The contractor shall prepare and submit electronic monthly progress reports to the EPA WAM and EPA PO. This progress report will document the costs incurred and work performed during the previous accounting period, and the work planned for the current accounting period.

In addition to a monthly progress report, the contractor shall prepare mid-monthly and monthly status summaries to the EPA WAM and EPA PO. The mid-monthly and monthly status reports shall list the following information by task: summaries of costs and LOE expended for the reporting period; a table of hours by personnel for each task; and the cumulative hours (LOE) and dollars (and the percentage of each) expended for each task. The mid-monthly and monthly summaries of costs and expenditures LOE shall be provided prior to the progress report. These reports and summaries shall use a format similar to that used by the contractor to report such information for previous WA 0-29 and WA 1-29. The contractor shall inform the EPA CO, PO and WAM in writing when 50%, 75%, and 90% of the allocated hours or dollars have been expended.

TASK 1 – DELIVERABLES					
Deliverable	Due Date				
Work Plan	15 days from issuance of work assignment				
Monthly Progress Reports	Monthly				
Monthly & Mid-monthly Status Summaries	Mid-monthly and monthly				

Task 2 – Quality Assurance (PWS Section 3.0)

Tasks included in this work assignment are continuing work for the steam electric effluent guidelines regulatory support approved under WA 9-29 of a previous contract (68-C-02-095) and under previous WA 0-29 and WA 1-29 of current contract (EP-C-12-021). See Attachment B for effluent guidelines development process.

In this WA the contractor shall continue tasks as approved in the previous option period QAPP and according to sections (2.3.3, 2.4, 2.7, 2.8, 4, 6, 7, 8, 10, 11, 12) of the programmatic QAPP that are applicable to this WA.

2.1 Background

Quality Assurance Project Plans are required under the Agency's Quality Assurance Policy CIO-2105, formerly EPA Order 5360.1 A2 (May 2000), and implementing guidance CIO-2105-P-01-0 (May 2000). All projects that involve the generation, collection, analysis, and use of environmental data must have an approved Quality Assurance Project Plan (QAPP) in place prior to the commencement of the work. Examples of these environmental data operations are provided in **Table 1-1** below.

Table 1-1. Examples of work that involves the collection, generation, evaluation, analysis, or use of environmental data

Item	Examples
Data	Includes field sampling information (sample location information, flow measurements, temperature, pH,
	physical observations, etc.), laboratory measurements (e.g., chemical, physical, biological, radiological
1	measurements), data collected from questionnaires, economic data, census data, and any other types of
	existing data (i.e., data generated for a different purpose or generated by a different organization)
Data	Includes field studies, laboratory studies, and generation of modeling output

Item	Examples
generation	
Data collection	Includes field surveys, questionnaire surveys, literature searches, and third party data
Data evaluation	Includes data inspection, review, assessment, and validation
Data analysis	Includes statistical, engineering, and economic analysis, and testing, evaluation, and validation of methods and models; database creation, data extraction, and data manipulation
Data Use	Any use of data to support EPA decisions, regulations, policy, publications, or tools (including effluent guidelines, 304(m) program, standards, environmental assessments, and models, tools, or reports disseminated by EPA to assist other organizations in implementing environmental programs)

Note that QAPPs are required for the development or revision of models and software that support the generation, collection, evaluation, analysis, or use of data. (A model is set of equations and assumptions used to predict unknown data.) When existing models are used as a tool to generate or evaluate data, the project QAPP must describe the model and explain how it will be used and how its output will be evaluated to ensure the modeling effort meets the overall quality objectives for the project. Development or revision of new models also must be supported by a QAPP that describes the objectives for the model, the quality criteria that will be applied to the model, and the procedures for evaluating whether the model meets those criteria.

2.2 QA Project Plan Requirements

The Contractor prepared a contract-wide Programmatic QAPP (PQAPP) for Contract EP-C-12-021. This PQAPP describes, in a single document, information that is not site or time-specific, but applies throughout the program (i.e., the duration of the contract). When tasked with preparing the PQAPP, the Contractor was informed that the PQAPP may need to be supplemented with project-specific details to support individual work assignments that involve the collection, generation, evaluation, analysis, or use of environmental data.

The activities in this work assignment involve gathering, evaluating, analyzing, and otherwise using existing environmental data (also known as "secondary" use of data). However, EPA has determined that the Contractor is operating under the existing PQAPP and that the PQAPP addresses QA requirements for this work assignment. In support of this work assignment, the Contractor shall ensure that the work plan provides enough detail to clearly describe specific objectives of the project(s) supported by this work assignment, including typical questions that must be answered when collecting and analyzing existing data to support effluent limitations and guidelines industry rulemaking.

- Using existing sources of data to perform analyses in support of the Steam Electric Industry Effluent Guideline Study.
- The type of data to be gathered or used under this work assignment to support the project objectives—including data from search engines, federal databases, EPA data bases—as well as a rationale for when those databases are appropriate and what data available in each will support the project.
- The quality objectives needed to ensure the data will support the project objectives.
- The QA/QC activities to be performed to ensure that any results obtained are documented and are of the type, quality, transparency, and reproducibility needed.

2.3 Additional QA Documentation Required

The EPA Quality Manual for Environmental Programs (CIO 2105-P-01-0, May 2000) requires published Agency reports containing environmental data to be accompanied by a readily identifiable section or appendix that discusses the quality of the data and any limitations on the use of the data with respect to their originally intended application. The EPA Quality Manual further requires Agency reports to be reviewed by the QA manager (or other authorized official) before publication to ensure that an adequate discussion of QA and QC activities is included. The purpose of the review is to ensure the reports provide enough information to enable a knowledgeable reader to determine if the technical and quality goals were met for the intended use of the data. Reports should include applicable statements regarding the use of any environmental data presented as a caution about possible misuse of the data for other purposes.

For example, a Technical Support Document or Study Report must include a clear discussion of the quality management strategies (including the project goals and objectives, quality objectives and criteria, and QA/QC practices) that were employed to control and document the quality of data generated and used. These documents should also discuss any deviations from procedures documented in the EPA-approved QAPP(s) supporting the project, the reasons for those deviations, any impact of those deviations had on data quality, and steps taken to mitigate data quality issues.

In support of this Agency requirement, all major deliverables (e.g., Technical Support Documents, Study Reports, Analytical Methods) produced by the Contractor under this work assignment must include a discussion of the QA/QC activities that were performed to support the deliverable, and this discussion must provide a sufficient level of detail to allow the EAD QA Coordinator (or designee) to determine if the QA/QC strategies implemented for the project sufficiently support the intended use of the data. Upon receipt, the EPA WAM will review each applicable report and certify whether the Contractor has adhered to the QA requirements documented in the Contractor's PQAPP.

The Contractor also shall provide EPA with monthly reports of QA activities performed during implementation of this work assignment. These monthly QA reports shall identify QA activities performed to support implementation of this work assignment, problems encountered, deviations from the QAPP, and corrective actions taken. If desired, the Contractor may include this as a part of the contract-required monthly financial/technical progress report.

2.4 Data Quality Act/Information Quality Guidelines Requirements

The Data Quality Act (also known as the Information Quality Act) requires EPA to ensure that influential information disseminated by the Agency is sufficiently transparent in terms of data and methods of analysis that the information is capable of being substantially reproduced. To support compliance with these data transparency/ data reproducibility requirements, EPA plans to include QAPPs as part of any rulemaking record documentation to be made available to the public. (This includes PQAPPs and SQAPPs.) The Contractor may claim information in QAPPs as confidential; if the Contractor chooses to do so, the Contractor shall submit a sanitized (i.e., public) version and an unsanitized (i.e., confidential) version at the time the QAPP is submitted for approval by EPA. The sanitized version shall be included in the public docket for the applicable rulemaking (or other docket record), and the unsanitized version shall be included in a non-public (i.e., confidential) portion of the docket (or record).

Information contained in the approved QAPP shall be transparent and reproducible and meet the requirements of the Data Quality Act for influential information. EPA's Guidelines for Ensuring and

Maximizing the Quality, Objectivity, Utility, and Integrity, of Information Disseminated by the Environmental Protection Agency (EPA/260R-02-008, October 2002), referred to as "EPA's Information Quality Guidelines," describe EPA procedures for meeting Data Quality Act requirements. Section 6.3 of EPA's Information Quality Guidelines indicate that "especially rigorous robustness checks" should be applied in circumstances where quality-related information cannot be disclosed due to confidentiality issues. Where applicable, the Contractors should indicate which results were obtained using the tools (SOPs, checklists, and guidelines) that the Contractor designates as confidential so that the EPA WAM can easily identify the areas that shall require rigorous robustness checks and document that those checks have been performed. At the discretion of the EPA WAM, the Contractors may be requested to prepare pre-dissemination review checklist as described in Section 5.5 of the Office of Water Quality Management Plan, February 2009. If this is required, the EPA WAM shall notify the Contractor through written technical direction.

Tasks included in this work assignment are continuing work for the steam electric effluent guidelines that was covered by the QAPP for WA 0-29 and WA 1-29.

TASK 2 – DELIVERABLES					
Deliverable	Due Date				
Monthly Reports of QA work performed (may be included in the Contractor's monthly progress report)	Monthly throughout the WA period of performance				

Task 3 – Industry Profile, Wastewater Characterization, and Treatment Technology Evaluations (PWS Section 3.1, 3.2, 3.4, 3.4.1, 3.4.2, 3.4.3, 3.4.4, 3.5, 4.0)

During a previous option period, the contractor collected and analyzed information necessary to develop effluent guidelines regulations for the steam electric power generating point source category proposed rule. In this WA, contractor shall continue necessary tasks after proposal to update information used to determine the industry profile.

Site Visits:

The contractor shall prepare for, participate in and document facility site visits. At the direction of the EPA WAM, the contractor shall support EPA in identifying appropriate plants at which to conduct site visits and will assist in identifying site visit objectives and questions. The need of potential site visits will be determined during the final rule making process.

The contractor shall provide draft reports of each site visited to the EPA WAM for review. Once the EPA WAM's comments are incorporated, the contractor shall provide the EPA WAM with a revised draft report to send to the facility contact for review and comment. The contractor shall incorporate facility comments and finalize the report for inclusion in the administrative record. If the facility has claimed "Confidential Business Information" (CBI), the contractor shall prepare a sanitized version of the report for the public record.

EPA will use site visit information, sampling data, industry survey data, and other sources gathered

under WA 1-29 (and previous work assignments during the steam electric ELG rulemaking) to continue work on the following subtasks. The contractor shall continue work on subtasks for the final rule and shall revise information as appropriate to support ELGs revisions. Under this work assignment contractor shall provide technical support for:

• Characterize Pollutant Discharges:

The contractor shall continue work performed under previous WA 1-29 and update any information according to comments receive during final rule. As part of this effort, the contractor shall participate in the International Water Conference (Orlando, Florida) in November 2014 to obtain newly-released information on the state-of-the-art treatment technologies for waste streams under study.

Industry Profile:

The contractor shall update EPA's profile of the steam electric industry. The profile shall be updated to include relevant information provided during the final rule comment period for fossiland nuclear-fueled steam electric power plants, specifically the coal-, oil-, and petroleum cokefired plants/units with wet FGD systems and wet ash handling practices.

• Analyses of Industry Survey Data:

The contractor shall continue to provide technical assistance in reviewing industry responses to an information collection request (also referred to as ICR or questionnaire) for the steam electric power generating industry as EPA continues efforts to develop final rule. During previous WA 1-29, the contractor provided data summaries and analyses based on questionnaire data, as well as developed national estimates and other descriptive statistics. In this WA, the contractor shall develop a sanitize version of the questionnaire database and perform related tasks based on written technical direction from the EPA WAM.

• Technology and Process Change Evaluations:

The contractor shall continue work performed under previous WA 1-29 where emerging technologies were identified and evaluated. In this WA contractor shall finalize technology assessment memo initiated under previous WA 1-29.

• Calculate Compliance Costs and Pollutant Reductions for Regulatory Options:

During WA 1-29, the contractor estimated facility-level and industry-level costs for facilities to comply with candidate regulatory options, and quantified the facility-level and industry-level pollutant reductions that would result from installing pollution controls. In this WA the contractor will take calculated loads and costs for the final rule and reanalyze them based on the comments received during the comment period or from other sources during the final rule review process. These cost and pollutant reductions estimates may be determined on an individual facility-specific basis, or they may be evaluated using a set of prototype facilities and then using these results to estimate total industry values. Finally, the contractor shall document its revised loadings methodologies and calculations.

• Prepare Technical Development Document and Supporting Documentation:

The contractor developed under previous WA 0-29 a technical development document and supporting documentation that summarized the key data collection and analysis activities for the effluent guidelines proposed rule. In this WA the contractor shall begin drafting sections for the final TDD, preamble and other supporting documentation for the effluent guidelines final rule

where comments received during final comment period are addressed. The TDD shall follow same format employed during previous WA 0-29 in addition to revisions obtained during final rule process.

• Prepare Comment Responses:

The contractor shall continue work performed during WA 1-29 to develop and revise responses to address comments received during proposed rule public comment period. In this WA the contractor shall provide assistance in reviewing comments received during final rule comment period per WAM's request.

TASK 3 – DELIVERABLES					
Deliverable	Due Date				
• First draft of site visit reports (if site visit is needed)	• Within 3 weeks after the site visit				
Revised draft of site visit reports	• Within 3 weeks following receipt of comments from EPA WAM review				
• Final site visit reports	• Within 3 weeks following receipt of facility comments				
• "Sanitized" site visit reports	• Two weeks after delivery of final site visit report, if required by CBI concerns				
Facility-level and industry-level compliance costs and pollutant reductions for option selection analyses	TBD by WAM				
Final version of emerging pollution control technologies assessment memo	TBD by WAM				
Profile updates and analyses of industry survey data	TBD by WAM				
Initial Draft TDD	March 15, 2015				
Draft TDD for Interagency Review	April 15, 2015				
Cost and Loads Report – Draft Sanitized Version for Interagency Review	April 15, 2015				

TASK 3 – DELIVERABLES				
Deliverable Due Date				
Sanitized version of questionnaire database for final rule	June 19, 2015			

Task 4 - Environmental Engineering Analyses (PWS Sections 3.4, 3.4.1, 3.5)

The contractor shall continue work provided under WA 1-29 and Amendment 1. In this WA the contractor shall provide all necessary technical and scientific support to EPA to finalize the environmental assessment (EA) and benefits analysis of the steam electric effluent limitations guidelines. This includes the analysis of the potential revised/improved environmental assessment methodologies used for the proposed rule, review case studies and incorporate enhanced ecological risk modeling into the risk assessment and case study models developed under approved work plan Task 2.4.4, implementing improvements to the EA as decided upon by the WAM, organizing and responding to comments provided for proposed rule. The outputs of this effort shall be incorporated into the benefits analyses for the revised ELGs.

The contractor shall aid in the development of technical supporting documents for final rule and develop a draft environmental assessment report. The contractor shall cooperatively participate on the Contractor(s) - EPA Team supporting the environmental engineering and benefits analysis work. Under this work assignment contractor shall work on the following subtasks:

- Conduct new/improved analyses or EA methodologies as directed by the WAM in support of the final ELG rule.
- Implement new and improved EA methodologies as directed by the WAM.
- Run additional/revised water quality model runs, if directed by the WAM, to support the final regulatory option or to fulfill harmonization with the ORCR CCR rule.
- Determine national scale power plant pollutant impacts on estuarine and marine waters, if feasible, and if directed by the WAM.
- Assist in preparing preamble, rule language and technical support materials for final rule.
- Provide support on response to comments on environmental impacts/environmental improvements and other EA issues for the final rule.
- Continue collaboration with the economics analysis team to provide all necessary endpoints, data and information to conduct the benefits analyses to support the final rule.

• Continue to review and analyze ORCR eco-risk assessment work on the ORCR CCR rule, and other tools and products as directed by the WAM to assess quality, accuracy, consistency and comparability of the final steam electric environmental assessment work.

TASK 4 – DELIVERABLES							
Deliverable	Due Date						
Review and analyze ORCR risk assessment work and incorporate any necessary improvements to EA work.	Ongoing during period of performance						
Conduct new/improved analyses as directed by the WAM in support of the final ELG rule. (e.g. bromides analysis)	TBD by WAM						
Implement new and improved EA methodologies as directed by the WAM.	TBD by WAM						
Run additional/revised water quality model runs, if directed by the WAM, to support the final regulatory option and/or to fulfill harmonization with the ORCR CCR rule.	TBD by WAM						
Determine impacts on estuarine waters, if feasible	TBD by WAM						
First Draft EA analyses reports to support option selection.	March 15, 2015						
First Draft - Prepare preamble and rule EA language and technical support materials.	March 15, 2015						
First Draft Submit draft revised SE- EA report and supporting documents	March 15, 2015						
First Draft EA analyses reports to support option selection.	April 15, 2015						
First Draft - Prepare preamble and rule EA language and technical support materials.	April 15, 2015						
First Draft Submit draft revised SE- EA report and supporting documents	April 15, 2015						

Task 5 – Coordination/Harmonization of ELG and CCR Analyses (PWS Section 3.4, 3.4.1, 3.4.2, 3.4.3, 3.5, 3.6)

The contractor shall continue work performed during WA 1-29 by reviewing the incremental compliance costs, pollutant reductions, and other environmental effect measures for revisions to the steam electric ELGs, relative to full implementation of a CCR rule. The contractor shall use for this analysis information provided by the EPA WAM, along with information prepared by ORCR and its contractors for the CCR rule. Such analyses shall evaluate the degree to which CCR rule implementation will trigger facility actions that eliminate or reduce ELG compliance costs, and how CCR implementation will affect pollutant reductions and other measures of environmental improvement that would be achieved by final ELG revisions.

TASK 5 – DELIVERABLE					
Deliverable	Due Date				
Incremental compliance costs & pollutant removals (ELG relative to CCR)	TBD by WAM				

Task 6 – General Technical Support (PWS Section 3.0, 3.5, 3.6)

Using information provided by the EPA WAM, along with information gathered or developed by the contractor, the contractor shall assemble information and perform analyses related to power plant discharges as directed by the EPA WAM through written technical direction. Much of the information used is expected to be an outgrowth of data collected under the other tasks of this work assignment. The tasks may include work such as support in preparing or gathering data for presentation at technical meetings, summarizing data to brief management on aspects of power plant operations, or preparing materials and participating in meetings, conferences and workshops to support EPA's outreach activities to the public, industry, and regulatory authorities. These materials may include reports, brochures, leaflets, posters, or other presentation materials. For purposes of preparing a work plan, the contractor shall assume there will be approximately ten written technical directives.

In addition, the contractor shall provide technical support as directed by the WAM to support permit authorities during permits review process and its implementation. The contractor shall provide technical support, such as revised engineering data based on comments received during proposed rule, which may be required to aid in the development of the initial draft and final economic impact analysis report for the final rule.

TASK 6 – DELIVERABLE	
Deliverable	Due Date
General technical support (as described above)	By written technical direction

Task 7 – Record Support (PWS Section 3.0, 3.5)

The contractor shall assemble and maintain a record of all documents relevant to the rulemaking proceedings, including preparing electronic versions of documents for the Agency's electronic docket system and preparing non-CBI versions (sanitized) of documents for public release. The contractor shall maintain an index of record materials and deliver the index to the EPA WAM quarterly. Upon written technical direction, the contractor shall deliver record documents to the electronic docket.

In addition, the contractor shall provide support in responding to Freedom of Information Act (FOIA) requests for records. Such support includes researching existing documentation to identify potentially responsive records for the FOIA request and/or any FOIA appeal, and assisting EPA in compiling responsive documents. For purposes of developing the work plan, the contractor should assume that there will be at least five FOIA requests for which support described above may be required.

TASK 7 – DELIVERABLES						
Deliverable	Due Date					
Index of record materials	Quarterly					
Identify/compile FOIA-responsive records	By written technical direction					
Index of items in the docket for the final rule	By written technical direction					
Complete the upload of documents to the docket for the final rule	By written technical direction					

Task 8 - Regulatory Support (PWS Section 3.5, 3.6)

Upon written technical, the contractor shall assist EPA in developing and reanalyzing regulatory options and its implementation, based on comments on the final rule provided during the public comment period. Technical support under this task shall include preparing text for use in Federal Register preambles, providing technical assistance in developing revisions to the regulations, and assisting in the development of notices of data availability. Tasks may also include providing supporting information and documentation for regulatory option packages, briefings, and selected analyses and data summaries. Deliverables under this task may include quick-response tasks.

TASK 8 – DELIVERABLE					
Deliverable	Due Date				
Draft text for inclusion in Federal Register notice, preambles and notices of data	TBD by WAM				

availability; draft regulatory text	
Initial Draft Preamble for Final Rule	March 15, 2015
Analysis of regulatory options	By written technical direction

Task 9 – Response to Public Comments (PWS Section 3.5, 3.6, 4.0)

The contractor shall continue providing technical support to EPA's efforts to respond to public comments received on the proposed rule. This support may include, but is not limited to, the following activities: reviewing, assessing, and compiling public comments; complete coding of comments and entering them into a database that can be used by all appropriate personnel that will be developing or reviewing comment responses; compiling information that will be used to develop responses to comments; and drafting responses. Responses may consist of individual comment responses, or they may be in the form of essays that address major issues or frequently stated comments. The contractor shall provide monthly reports regarding the status of comment response activities, including summary statistics for the number of comments for which responses have been drafted (or not drafted) and the review/approval status of the responses.

TASK 9 – DELIVERABLES						
Deliverable	Due Date					
Draft response to public comments received for proposed rule	By written technical direction					
Monthly report of status of comment response activities	Monthly					

Attachment A – Improving the Deliverable Review Process

Work Assignment 2-29 involves the production of several types of written products ranging from deliberative memos to published reports. The general work flow is for EPA to provide written guidance to the contractor on the development of these products. The contractor then develops the initial versions of these products. EPA reviews and revises these documents prior to finalization. Several iterations of development, review, and revision may be necessary prior to product finalization. The EPA WAM and contractor will use the following terminology and clarify the expectations for each deliverable via written direction.

Clarification of Terminology

One way for EPA to anticipate the amount of EPA review necessary for a contractor deliverable would be to better define the phase or version of the document in the development, review, and revision process. The following terms will be used in describing the phase or version of the contractor's deliverables: Concept Memo, First Draft, and Draft Final. These phases are described below.

Concept Memo – A document used to present ideas for discussion. The writing style is not necessarily formal and may be as simple as presenting a list of ideas or options. The concept memo is considered an internal deliberative document and may be the result of prior topic discussions (and brainstorming meetings) between EPA, the contractor, and other stake-holders. EPA does not expect this type of document to have received senior technical review or the input of a technical editor. However, the concept memo is expected to have received some level of review (e.g., an internal contractor "peer-topeer" review) prior to delivery to EPA. Based on past experience, a concept memo is most useful as a tool to guide EPA in determining the desired audience and structure of a future "public-ready" work product.

First Draft – An early version of a document that will ultimately be "public-ready". The document may still be an internally deliberative product. The writing style is clear but formal. The audience and structure (such as outline or questions to be answered) have been previously defined by and reviewed with EPA. This version is considered appropriate for senior technical review, particularly to confirm that the document answers the questions it is meant to address and that the document is appropriate for the intended audience. It is reasonable to expect that senior technical review may lead to further conversations with EPA. EPA's review of the deliverable is intended to confirm that ideas and concepts are presented as intended.

Draft Final – A "public-ready" document that is ready for distribution to an internal audience (e.g., EPA workgroup) or external audience (e.g., EPA's Docket). The contractor shall confirm with EPA the intended audience for this document. Additionally, this version of the document incorporates EPA's comments on the previous versions of the document. Prior to submission to EPA the document will be reviewed by a technical editor to ensure consistency with the Executive Memorandum on 1 June 1998 directing the Executive Departments and Agencies to write in plain language. Specifically, the technical editor will revise the document to address the following questions.²

- Is the document organized to serve the needs of readers?
- Does the document explain how it is organized and how to use it?

² These questions were modified from the following EPA's website: http://www.epa.gov/plainlanguage/faqs.htm

- Does the document start with items of most interest to reader?
- Are the chapter, table, and figure titles descriptive and helpful to readers in finding specific information more easily?
- Are complicated topics summarized before describing all the details?
- Does the document use the active voice?
- Does the document include only information readers actually need?
- Does the document use easy-to-read design features like lists, tables, graphics, and "white space"?
- Are citations for references clearly identified and does the reader know how to gain access to these references?

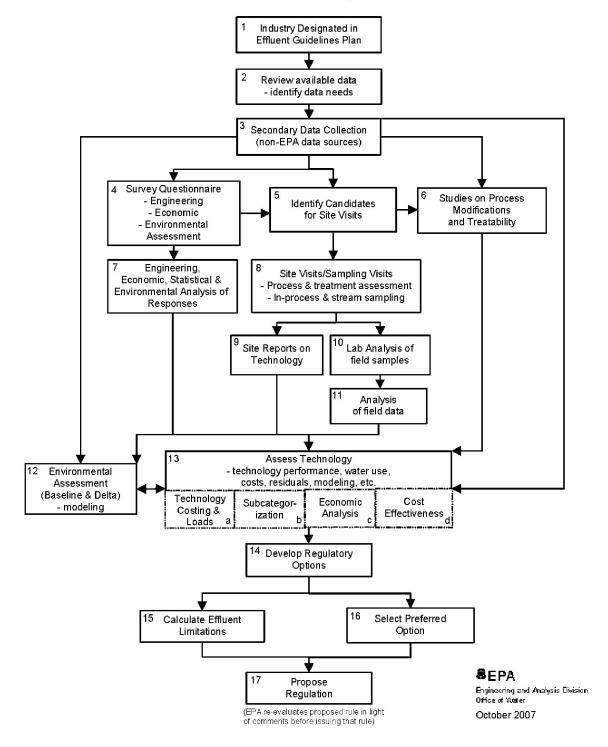
Additionally, the contractor will get approval from EPA on any other style sheets for Draft Final documents.

Clarification of EPA's Expectations for Deliverables

The deliverable review process can be improved if EPA clearly states its expectations for when senior technical review should take place and the purpose of the review. Specifically, EPA should identify for the contractor the "big-picture" objectives and questions for the senior technical review to address. The review should be able to comment on the clarity of the document and whether the document met the objectives and answered the questions identified by EPA. The contactor will share with EPA a summary of the review.

Attachment B

Effluent Guidelines Development Process



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Performance Work Statement Contract EP-C-12-021 Work Assignment 2-29 Amendment 1

Title: Steam Electric Effluent Guidelines Regulatory Support

Work Assignment Manager (WAM): Jezebele Alicea-Virella

Alternate Work Assignment Manager: Ronald Jordan

Task Manager (Task 4): William Swietlik

Period of Performance (POP): May 28, 2015 through September 25, 2015

Purpose:

The purpose of this work assignment Amendment 1 is to increase the level of effort (LOE) for WA 2-29 with no changes in scope. Under WA 2-29, the contractor is supporting EPA in the development of revised effluent limitations guidelines and standards (ELGs) for the steam electric power generating point source category (40 CFR Part 423). Amendment 1 includes an increase of the level of effort due to higher expenses associated with the following tasks:

- Freedom of Information Act requests final CBI determination process support.
- Additional EA model runs to reflect case studies not included during proposal.
- Revisions to preamble and review of additional comment responses to address outstanding questions for final agency review.
- Adjustments to methodologies for estimating compliance costs and pollutant reduction and other related analysis to include Clean Power Plan rule.

In order to meet EPA's final rule consent decree deadline, the contractor requires more resources (i.e. staff and hours) to continuing support during the interagency review process.

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Performance Work Statement Contract EP-C-12-021 Work Assignment 2-29 Amendment 2

Title: Steam Electric Effluent Guidelines Regulatory Support

Work Assignment Manager (WAM): Jezebele Alicea-Virella

Alternate Work Assignment Manager: Ronald Jordan

Task Manager (Task 4): William Swietlik

Period of Performance (POP): August 20, 2015 through September 25, 2015

Purpose:

The purpose of this work assignment Amendment 2 is to increase the level of effort (LOE) for WA 2-29 with no changes in scope. Under this work assignment, the contractor is supporting EPA in the development of revised effluent limitations guidelines and standards (ELGs) for the steam electric power generating point source category (40 CFR Part 423). Although Amendment 1 for this work assignment included an increase of the level of effort, due to higher demand on tasks related to support the interagency review for the final rule, estimated LOE increase will not be sufficient to cover support needed for tasks associated to the final rulemaking until the end of the current performance period.

For example, higher expenses such as acquiring more staff support to address comments and rerunning the costs and loads model are affecting the LOE required to support further tasks such as:

- Additional EA model runs to reflect case studies not included during proposal.
- Revisions to preamble and review of additional comment responses to address outstanding questions for final agency review.
- Adjustments to methodologies for estimating compliance costs and pollutant reduction and other related analysis to include Clean Power Plan rule.
- Finish final rule docket development and sanitization.

In order to meet EPA's final rule consent decree deadline and to continuing support during the interagency review process, this Amendment 2 requests an increase of LOE for WA 2-29.

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Contractor WP Dated: 08/31/20	115 Cos	C. 197000 000 0	,262.00	тако лургото	0.000	500					
Cumulative Approved:		-	851,862.0) ()		: 18,227					
••	ebele Alicea	7-7	001,002.0			nch/Mail Code:					
Work Assignment Manager Name 0 e 2	ebele Alicea						02-56	66-1755			
(Signature)			(Date	1	200 020000	Number:		70 1700			
(Signature) (Date) Project Officer Name Meghan Hessenauer					30.00 400.0	nch/Mail Code:					
						ne Number: 20	12-56	56-1040			
(Signature) (Date)						Number:	72 30	70 1040			
Other Agency Official Name						nch/Mail Code:					
						ne Number:					
(Signature)			(Date)		Number:					
Contracting Official Name Brad He	eath		,	60		nch/Mail Code:					
					Pho	ne Number: 5	13-4	87-2352			
(Signature)			(Date)	— FAX	FAX Number:					